

**BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

|  |   |                  |
|--|---|------------------|
| In the matter of Petition of AT&T South      | ) |                  |
| Carolina for Order Confirming Relinquishment | ) | Docket No. _____ |
| Of Eligible Telecommunications Carrier       | ) |                  |
| <u>Designation Throughout the State</u>      | ) |                  |

**PETITION OF AT&T SOUTH CAROLINA FOR ORDER CONFIRMING  
RELINQUISHMENT OF ELIGIBLE TELECOMMUNICATIONS CARRIER  
DESIGNATION THROUGHOUT THE STATE**

Pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205, AT&T South Carolina<sup>1</sup> (“AT&T”) respectfully requests that the Public Service Commission of South Carolina (“Commission”) enter an Order confirming relinquishment of its remaining Eligible Telecommunications Carrier (“ETC”) designation throughout South Carolina effective February 15, 2022 (the “effective date”). As explained below, only 91 AT&T South Carolina customers receive Lifeline discounts from AT&T South Carolina, and each of these 91 customers can elect either to continue receiving services from AT&T South Carolina without any Lifeline discount or to receive services from at least 4 (and up to 15) other Commission-designated ETCs, subject to any Lifeline discounts that are available under federal or state law. AT&T South Carolina’s relinquishment, therefore, complies with applicable law, and AT&T South Carolina respectfully requests an Order confirming this relinquishment by September 15, 2022 so AT&T can provide its affected customers with ample notice prior to the relinquishment effective date.

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<sup>1</sup> BellSouth Telecommunications, LLC d/b/a AT&T South Carolina

## I. BACKGROUND AND SUMMARY

In 2017, the Commission entered an Order confirming AT&T's relinquishment of its ETC designation for the portions of its service territory in South Carolina in which it was no longer receiving support from the Federal Communications Commission's ("FCC's") Connect America Fund Phase II ("CAF II") program<sup>2</sup> (which comprised about 99% of AT&T's service territory in the State). AT&T South Carolina has remained an ETC in the approximately 1% of its service territory in which it participates in the FCC's CAF II program, but after December 31, 2021, AT&T South Carolina will no longer receive CAF II support for providing any service to any customers anywhere in South Carolina. Accordingly, and consistent with the 2017 Relinquishment Order, AT&T elects to relinquish its remaining ETC designation in all areas in South Carolina ("relinquishment area."). Upon this relinquishment, AT&T South Carolina no longer will be an ETC in any portion of the State of South Carolina.

Only 91 AT&T South Carolina customers in the relinquishment area receive Lifeline discounts from AT&T South Carolina. As was the case in 2017, upon entry of the requested Order, each of these 91 AT&T South Carolina customers can elect either to continue receiving services from AT&T without any Lifeline discount or to receive services from at least 4 (and up to 15) other Commission-designated ETCs, subject to any Lifeline discounts that are available under federal or state law.

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<sup>2</sup> Commission Directive/Order No. 2017-276 in Docket No. 2017-109-C (May 3, 2017)(<https://dms.psc.sc.gov/Attachments/Matter/72292411-b34f-4780-a71f-8b3f4af1102a>) ("2017 Relinquishment Order").

Federal law allows AT&T to relinquish its remaining ETC designation in South Carolina because, as described below, the relinquishment area is served by at least one (and in fact, many more than one) other ETC(s). To be clear, ***by this Petition AT&T is not discontinuing any legacy voice service that a non-ETC like AT&T is required to provide under applicable law.*** AT&T will continue to offer and provide legacy voice service and will continue to comply with applicable service obligations in all of its service territory in South Carolina, unless and until it separately obtains any necessary permission to stop providing such services.

## II. PETITION

1. AT&T is an incumbent local exchange carrier (“ILEC”) in South Carolina. On November 24, 1997, the Commission granted AT&T’s request, pursuant to 47 U.S.C. § 214(e)(1), for designation as an ETC within its ILEC service area.<sup>3</sup>

2. In 2017, the Commission granted AT&T’s request to relinquish its ETC designation for areas in South Carolina where it was not participating in CAF II.<sup>4</sup>

3. Historically, AT&T as an ETC was eligible to receive federal universal service funding in accordance with 47 U.S.C. § 254, in exchange for which it was required to offer supported services pursuant to 47 C.F.R. § 54.201(d) and meet the obligations associated with the universal service programs in which it participates.<sup>5</sup> Since its inception, federal universal service funding has included federal “high cost” support to deploy and maintain networks in rural and

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<sup>3</sup> See Order Designating LECs as Eligible Telecommunications Carriers, *In Re Proceeding to Establish Guidelines for an Intrastate Universal Service Fund*, Order No. 97-958 in Docket No. 97-239-C (November 24, 1997).

<sup>4</sup> See fn 3 above.

<sup>5</sup> See 47 U.S.C. § 214(e)(1).

other high-cost areas,<sup>6</sup> as well as reimbursement from the federal Lifeline Assistance Program (“Lifeline”) for offering local telecommunications services to eligible low-income consumers at discounted prices.

4. In 2015, the FCC started disbursing high cost universal service support to AT&T pursuant to a new approach.<sup>7</sup> For price cap carriers like AT&T, the restructured program, referred to as CAF II, provided funding by census blocks rather than by larger areas such as wire centers or service areas. Price cap carriers that accepted model-based CAF II funding were obligated to: (a) remain an ETC in the CAF II Census Blocks; and (b) offer the Lifeline discount to eligible customers who reside in CAF II Census Blocks. CAF II funding support was provided to carriers for six years with the option to extend support for a seventh year. AT&T accepted CAF II support in South Carolina<sup>8</sup> and elected to receive a seventh year of support, so it will receive CAF II support through December 31, 2021.<sup>9</sup>

5. Subsequently, the FCC replaced the model-based CAF II support program with the Rural Digital Opportunity Fund (“RDOF”).<sup>10</sup> The Phase I auction for the RDOF started on

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<sup>6</sup> This is separate and distinct from high-cost support from the State USF, which AT&T has not received since 2009.

<sup>7</sup> See generally Report and Order, *Connect America Fund*, 29 FCC Rcd. 15644 (2014); Report and Order and Further Notice of Proposed Rulemaking, *Connect America Fund*, 26 FCC Rcd. 17663 (2011) (subsequent history omitted).

<sup>8</sup> See August 27, 2015 Letter from James Cicconi in FCC Docket No. 10-90. AT&T did not make this decision lightly – it declined the FCC’s offer of CAF II funding in three of the twenty-one states in which it is a traditional wireline ILEC (Missouri, Nevada and Oklahoma).

<sup>9</sup> See Letter from Susanna Biancheri, AT&T, to Marlene Dortch, FCC, WC Docket No. 10-90 (filed Sept. 23, 2020) (accepting a seventh year of CAF II support in Georgia and seventeen other states).

<sup>10</sup> See generally, Report and Order, *Rural Digital Opportunity Fund*, 35 FCC Rcd 686 (2020).

October 29, 2020 and concluded on November 25, 2020.<sup>11</sup> AT&T did not participate in the RDOF Phase I auction and, therefore, will no longer be receiving federal high cost universal service support in South Carolina under CAF II, RDOF, or any other program, after December 31, 2021.

#### A. SCOPE OF AT&T'S RELINQUISHMENT

6. Because AT&T will no longer be receiving any federal high cost universal service support in South Carolina, and because all 91 AT&T South Carolina Lifeline customers in the relinquishment area can elect either to continue receiving services from AT&T without any Lifeline discount or to receive services from at least 4 (and up to 15) other Commission-designated ETCs (subject to any Lifeline discounts that are available under federal or state law)<sup>12</sup>, AT&T seeks an order confirming relinquishment of its remaining ETC designation in all areas of the State of South Carolina. Upon this relinquishment, AT&T South Carolina no longer will be an ETC in any portion of the State of South Carolina.

7. By this Petition, AT&T is **not** discontinuing any legacy voice service that a non-ETC like AT&T is required to provide under applicable law. AT&T will continue to offer and provide legacy voice service and will continue to comply with applicable service obligations in all

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<sup>11</sup> See, e.g., *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced*, FCC Form 683 Due January 29, 2021, Public Notice, DA 20-1422 (rel. Dec. 7, 2020).

<sup>12</sup> Subject to limited exceptions, the federal voice Lifeline discount is currently scheduled to be reduced to \$0 on December 1, 2021. As the requested relinquishment effective date is February 15, 2022, the federal voice Lifeline discount will already have been removed from AT&T South Carolina's few remaining Lifeline customers prior to the relinquishment effective date. AT&T South Carolina also will no longer have an obligation to provide a Lifeline discount on broadband internet access service after December 31, 2021. However, customers that are eligible will still be able to receive Access from AT&T and the temporary Emergency Broadband Benefit for qualifying broadband plans. Consistent with previous changes to the federal Lifeline discount, AT&T will provide ample notice to affected customers.

of its service territory in South Carolina, unless and until it separately obtains any necessary permission to stop providing such services.

## B. LEGAL STANDARD

8. In 47 U.S.C. § 214(e)(2) and (4) and 47 C.F.R. § 54.205, Congress and the FCC delegated authority to state commissions to designate carriers as ETCs and permit carriers to relinquish their ETC designation. The standard for relinquishing an ETC designation is set forth in 47 U.S.C. § 214(e)(4), which states, in pertinent part:

A State commission...*shall permit an eligible telecommunications carrier to relinquish its designation* as such a carrier *in any area served by more than one eligible telecommunications carrier*. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission...of such relinquishment.

(Emphasis added). The law does not treat relinquishment of an ETC designation by an ILEC any differently than relinquishment by other designated ETC, *and the Commission has previously allowed relinquishment of ETC designations, including by AT&T*.

## C. AT&T IS ENTITLED TO RELINQUISH ITS ETC DESIGNATION

9. AT&T meets the standard for relinquishing its remaining ETC designation because, as set forth in **Exhibit A**,<sup>13</sup> all portions of the relinquishment area have at least 4 other ETCs (and in some instances as many as 15 other ETCs) designated and approved by the Commission. To AT&T's knowledge, each of these providers remains designated an ETC in the areas designated in **Exhibit A**. As a designated ETC, each of these providers is obligated to provide applicable

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<sup>13</sup> In Exhibit A, AT&T South Carolina has attempted in good faith to include all wire centers in which it, in whole or in part, remains an ETC per the Commission's 2017 Relinquishment Order. That said, and to be clear, upon this relinquishment, AT&T South Carolina no longer will be an ETC in any portion of the State of South Carolina.

service upon reasonable request to eligible customers in the areas for which it obtained its ETC designation, and many consumers are already those services from these other ETCs.

#### **D. CUSTOMER NOTICE**

10. AT&T Lifeline customers will receive ample notice of the need to select another ETC in order to continue receiving any Lifeline benefit that is available under federal or state law. Among other things, at least 60 days prior to the relinquishment effective date, AT&T will provide notice in a separate letter via U.S. Mail to each of its remaining affected Lifeline customers explaining that AT&T will no longer offer any Lifeline benefit, and if the customer does not choose another provider, AT&T's standard prices (including applicable surcharges, fees and taxes) will apply to the customer's existing AT&T service. AT&T also will send each remaining affected Lifeline customer a second notice letter and a bill message at least 15 days prior to the relinquishment date. All notices will inform each affected customer that (s)he can contact the remaining ETCs in the area to discuss Lifeline benefits that may be offered by those ETCs, and all notices will inform affected customers how to contact the Universal Service Administrative Company ("USAC") to obtain a list of other ETCs in the state. **Exhibit B** is a sample of the language of these letters.

11. To avoid customer confusion and assist with a smooth transition process, and consistent with the approach in AT&T's Petition that the Commission approved in 2017, AT&T will stop enrolling South Carolina customers in the Lifeline program on September 15, 2021, or five (5) days after the Commission issues an Order, whichever is later.

### III. REQUESTED ORDER DATE

12. AT&T requests that the Commission issue an order granting this Petition as soon as possible, but no later than September 15, 2021, so that AT&T can provide ample notice to its Lifeline customers prior to the relinquishment effective date of February 15, 2022.

### VIII. CONCLUSION

For the foregoing reasons, AT&T South Carolina respectfully requests that the Commission grant this Petition expeditiously and enter an order confirming AT&T South Carolina's relinquishment of its ECT designation in all areas within the State of South Carolina, effective February 15, 2022.

Respectfully submitted this 3<sup>rd</sup> day of August 2021.



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ATTORNEY FOR AT&T SOUTH CAROLINA



STATE OF SOUTH CAROLINA                    )  
  )  
COUNTY OF RICHLAND                        )

CERTIFICATE OF SERVICE

The undersigned, Natasha Bergen, hereby certifies that she is employed by the Legal Department for AT&T South Carolina and that she has caused AT&T South Carolina's Petition for Order Confirming Relinquishment of Eligible Telecommunications Carrier Designation Throughout the State to be served by the method indicated below upon the following this 3<sup>rd</sup> day of August, 2021:

Daphne Duke  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
**(Electronic Mail [daphne.duke@psc.sc.gov](mailto:daphne.duke@psc.sc.gov))**

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*s/ Natasha Bergen*

Natasha Bergen, Assistant  
AT&T Services, Inc.  
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(512) 457-2323

# EXHIBIT A AT&T Lifeline Customers & Designated ETCs in AT&T South Carolina's Current Designated ETC Service Area

| Wire Center<br>CLLI | Exchange              | No. of AT&T<br>Lifeline<br>Customers* | Designated ETCs**                              |
|---------------------|-----------------------|---------------------------------------|--|
| AIKNSCMA            | AIKEN                 | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| ALDLSCMA            | ALLENDAL              | 1                                     | 1, 4, 9, 13, 14                                |
| ARSNSCAH            | ANDERSON              | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| ARSNSCMA            | ANDERSON              |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| ARSNSCTV            | ANDERSON              |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| BATHSCMA            | BATH                  |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| BAVLSCMA            | BLACKVILLE            |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| BETNSCMA            | BELTON                |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| BEVLSCMA            | BENNETTSVILLE         | 1                                     | 1, 4, 7, 9, 13, 14                             |
| BHISSCMA            | BEECH ISLAND          |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| BLBGSCMA            | BLACKSBURG            | 2                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| BLNHSCMA            | BLenheim              | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| BLRGSCMA            | BLUE RIDGE            |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| BMBRSCMA            | BAMBERG               |                                       | 1, 4, 7, 9, 13, 14                             |
| BRWLSCBE            | BARNWELL              | 3                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| BTBGSCMA            | BATESBURG             | 2                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CENTSCWS            | CENTRAL               |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CHAPSCCL            | CHAPIN-LITTLE MTN SO. | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CHAPSCCL            | CHAPIN-LITTLE MTN NO. |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CHRWSCES            | CHERAW                | 3                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CHTNSCDP            | CHARLESTON            |                                       | 1, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15    |
| CHTNSCDT            | CHARLESTON            |                                       | 1, 2, 3, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15    |
| CHTNSCJM            | CHARLESTON            |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CHTNSCJN            | CHARLESTON            |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CHTNSCLB            | CHARLESTON            |                                       | 1, 2, 3, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15    |
| CHTNSCNO            | CHARLESTON            |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CHTNSCWA            | CHARLESTON            |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CLIOSCMA            | CLIO                  | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CLMASCAR            | COLUMBIA              |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CLMASCCH            | COLUMBIA              | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CLMASCSH            | COLUMBIA              | 2                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CLMASCSU            | COLUMBIA              |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CLMASCSW            | COLUMBIA              | 2                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CLSNSCMA            | CLEMSON               |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CLTNSCMA            | CLINTON               | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CLVRSCES            | CLOVER                |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CMDNSCLG            | CAMDEN                |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| CMDNSCMA            | CAMDEN                | 4                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| DLLNSCMA            | DILLON                | 2                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| DNMKSCES            | DENMARK               | 1                                     | 1, 2, 4, 7, 9, 13, 14                          |
| DRTNSCMA            | DARLINGTON            |                                       | 1, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15    |

\* AT&T's Lifeline customer counts are as of June 2021.

\*\* The numbers in this column correspond to the competitive eligible telecommunications carriers (CETCs) identified on the last page of this Exhibit A.

# EXHIBIT A AT&T Lifeline Customers & Designated ETCs in AT&T South Carolina's Current Designated ETC Service Area

| Wire Center<br>CLLI | Exchange         | No. of AT&T<br>Lifeline<br>Customers* | Designated ETCs**                              |
|---------------------|------------------|---------------------------------------|--|
| EDBHSCMA            | EDISTO ISLAND    |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| EDFDSCMA            | EDGEFIELD        | 4                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| EOVRSCMA            | EASTOVER         | 3                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| ESLYSCMA            | EASLEY           |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| FLBHSCMA            | FOLLY BEACH      |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| FLRNSCMA            | FLORENCE         |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| FNINSCES            | FOUNTAIN INN     | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| FNVLSCMA            | SPARTANBURG      |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| GBSNNCMA            | NEWTONVILLE      |                                       | 1, 2, 9, 14                                    |
| GFNYSCMA            | GAFFNEY          |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| GIVLSCMA            | GRANITEVILLE     | 2                                     | 1, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15    |
| GNVLSCWP            | GREENVILLE       | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| GRVRNCMA            | ANTIOCH          |                                       | 1, 2, 3, 8, 9, 10, 11, 12, 14, 15              |
| HCGVSCMA            | HICKORY GROVE    |                                       | 1, 2, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15    |
| HNPVSCMA            | HONEA PATH       |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| HTVLSCMA            | HARTSVILLE       | 1                                     | 1, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15    |
| ISPLSCIS            | ISLE OF PALMS    |                                       | 1, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15       |
| ISPLSCIS            | SULLIVANS ISLAND |                                       | 1, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15       |
| JHTNSCMA            | JOHNSTON         | 5                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| JNVLSCMA            | JONESVILLE       | 2                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| JONNSCES            | JOANNA           |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| LATTSCLS            | LATTA            |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| LBRTSCMA            | LIBERTY          | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| LKVWSCMA            | LAKE VIEW        |                                       | 1, 2, 4, 7, 9, 13, 14                          |
| LKWLSCRS            | LAKE WYLIE       |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| LKWLSCRS            | LAKE WYLIE WEST  |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| LYMNSCIP            | LYMAN            |                                       | 1, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15    |
| MARNSCBN            | MARION           |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| MARNSCMA            | MARION           | 5                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| MCCLSCMA            | MCCOLL           |                                       | 1, 2, 4, 7, 9, 13, 14                          |
| MLNSSCWP            | MULLINS          |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| MLNSSCWP            | NICHOLS          |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| MNPLSCES            | MT PLEASANT      |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| MRTTSCMA            | TRAVELERS REST   |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| NAGSSCMA            | N. AUGUSTA       |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| NWBVSCMA            | NEWBERRY         | 3                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| NWELSCMA            | NEW ELLENTON     |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| ORBGSCMA            | ORANGEBURG       |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| PCKNSCES            | PICKENS          | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| PCLTSCMA            | PACOLET          |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| PNTNSCMA            | PENDLETON        |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |

\* AT&T's Lifeline customer counts are as of June 2021.

\*\* The numbers in this column correspond to the competitive eligible telecommunications carriers (CETCs) identified on the last page of this Exhibit A.

# EXHIBIT A AT&T Lifeline Customers & Designated ETCs in AT&T South Carolina's Current Designated ETC Service Area

| Wire Center<br>CLLI | Exchange           | No. of AT&T<br>Lifeline<br>Customers* | Designated ETCs**                              |
|---------------------|--------------------|---------------------------------------|--|
| PRSRSCMA            | PROSPERITY         | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| SALMSCMA            | SALEM              | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| SBRKSCSK            | CHARLESTON         |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| SCHLSCES            | SOCIETY HILL       |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| SENCSCMA            | SENECA             |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| SHRNSCMA            | SHARON             | 4                                     | 1, 4, 7, 9, 13, 14                             |
| SPBGSCBS            | SPARTANBURG        |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| SPBGSCMA            | SPARTANBURG        |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| SPBGSCWV            | SPARTANBURG        | 1                                     | 1, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15    |
| SPFDSCMA            | SPRINGFIELD-SALLEY |                                       | 1, 2, 4, 9, 13, 14                             |
| STGRSCMA            | ST GEORGE          | 6                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| SUVLSCMA            | SUMMERVILLE        | 3                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| SXMLSCMA            | SIX MILE           |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| TKNASCST            | SENECA             | 1                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| TMVLSCMA            | TIMMONSVILLE       | 1                                     | 1, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15    |
| UNINSCMA            | UNION              | 3                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| WHTMSCMA            | WHITMIRE           |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| WLHLSCES            | WALHALLA           | 5                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| WMNSSCES            | WESTMINSTER        | 6                                     | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| WMTNSCPW            | PELZER             |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| WMTNSCPW            | WILLIAMSTON        |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |
| YORKSCMA            | YORK               |                                       | 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 |

**Totals 91**

\* AT&T's Lifeline customer counts are as of June 2021.

\*\* The numbers in this column correspond to the competitive eligible telecommunications carriers (CETCs) identified on the last page of this Exhibit A.

**Exhibit C: AT&T Lifeline Customers & Designated ETCs in  
AT&T South Carolina's Current Designated ETC Service Area**

| <b>ID Code</b> | <b>CETC Name</b>  |
|----------------|---|
| <b>1</b>       | Air Voice Wireless, LLC                                   |
| <b>2</b>       | American Broadband And Telecommunications Company         |
| <b>3</b>       | Assurance Wireless Of South Carolina, LLC                 |
| <b>4</b>       | Blue Jay Wireless, LLC                                    |
| <b>5</b>       | Boomerang Wireless, LLC                                   |
| <b>7</b>       | Global Connection Inc. Of America d/b/a Stand Up Wireless |
| <b>8</b>       | IM Telecom, LLC   |
| <b>9</b>       | i-Wireless, LLC   |
| <b>10</b>      | Q Link Wireless, LLC                                      |
| <b>11</b>      | Safelink Wireless, Inc.                                   |
| <b>12</b>      | Sage Telecom Communications, LLC                          |
| <b>13</b>      | Tag Mobile, LLC   |
| <b>14</b>      | Telrite Corporation                                       |
| <b>15</b>      | Tempo Telecom, LLC  |

**Exhibit B****Your Lifeline Benefit from AT&T Ends February 15, 2022**

«FIRSTNAME» «LASTNAME»  
 «BILLINGADDRESS1» «BILLINGADDRESS2»  
 «BILLINGAPARTMENTNUMBER»  
 «BILLINGCITY», «BILLINGSTATE» «BILLINGZIP5»  
 «BILLINGZIP4»

Phone number ending in: <<XXXX>>

Hi «FIRSTNAME»,

AT&T will no longer provide you with a Lifeline benefit in South Carolina\* as of February 15, 2022.

**Your options:**

- Keep your AT&T home phone service, billed at regular price, with all applicable taxes, surcharges, and fees. Or, choose from any of our other plans. Call us at 855.301.0355, and we'll be happy to help.
- Contact another company that provides service in your area to see if they offer a Lifeline benefit. You can contact the Universal Service Administrative Company (USAC) at **800.234.9473** or go to [www.lifelinesupport.org](http://www.lifelinesupport.org) and select **Companies Near Me** for a list of companies in your area.
- Here is a list of providers that may offer service and a Lifeline benefit in your area.\*\*

*[Insert list]*

Thanks for choosing us,

**AT&T**

- \* If you have received a notice to recertify your eligibility to continue receiving a Lifeline benefit from USAC, or if you receive such notice in the future, please disregard it as AT&T will no longer provide a Lifeline benefit in your area.
- \*\* This list identifies Eligible Telecommunications Carriers (ETCs) based on publicly available resources. AT&T does not make any representations or warranties regarding the accuracy of this publicly available information or the services these ETCs may offer. You will need to contact these ETCs to determine whether any Lifeline benefit is available at your location from any of them.